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Interrogatories ask the "factual and legal basis" for the State's claims, as well as the names of witnesses. Others ask for the factual basis only, but again, those also request names of witnesses. Each Interrogatory that contains such language can fairly be interpreted to constitute five or six separate questions.

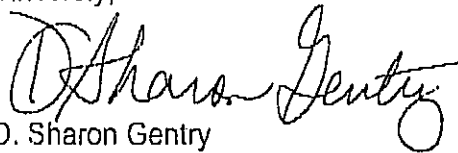
Cargill Turkey's Amended Interrogatories are also excessive. For example, Interrogatory No. 3 contains seven itemized subparts, and requests dates, facts, witnesses and documents for each. Other interrogatories are similarly constructed.

By way of this letter, the State is requesting that Cargill Inc. and Cargill Turkey withdraw, revise, and resubmit its Amended First Interrogatories in compliance with federal and local rules.

Please let me know at your earliest convenience when we can meet and confer regarding this issue as required by LCvR 37.1.

I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Sharon Gentry".

D. Sharon Gentry
FOR THE FIRM

/sg